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Attorneys for Plaintiffs,

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IO GROUP, INC., a California corporation,  
CHANNEL ONE RELEASING, Inc., a  
California corporation and LIBERTY  
MEDIA HOLDINGS, LLC., a California  
corporation,

Plaintiffs,

vs.

GLBT, Ltd., a British limited company,  
MASH and NEW, Ltd., a British limited  
company, PORT 80, Ltd., a company of  
unknown origin or structure, STEVEN  
JOHN COMPTON, an individual living in  
the United Kingdom, and DAVID  
GRAHAM COMPTON, an individual  
living in the United Kingdom.

Defendants.

)  
) **CASE NO.: C-10-1282 (MMC)**  
)  
) **AMENDED AND CORRECTED**  
) **DECLARATION OF MARC J. RANDAZZA**  
) **IN SUPPORT OF REWARD OF FEES**  
) **RELATING TO SANCTIONS MOTION**

1 I, MARC RANDAZZA, declare under penalty of perjury that:

2 1. I am over the age of 18 and am a resident of the State of Nevada.

3 2. I have personal knowledge of the facts herein, and if called as a witness, could  
4 testify competently thereto.

5 3. My original declaration, (Doc. 119) was filed without my final review, and had a  
6 number of material errors therein. It was not my intent to file an erroneous document. The  
7 moment that I detected the error, I began drafting this Amended and Corrected Declaration. This  
8 is the only Declaration of mine that should be considered in conjunction with the fee award  
9 sought, and the prior declaration (Doc. 119) should be discarded.

10 4. I represent Plaintiff, Liberty Media Holdings, LLC in its litigation nationwide.

11 5. I have built a reputation and career on my specific experiences relating to litigation  
12 involving copyright infringement via the Internet and have specific qualifications relating to such  
13 litigation.

14 6. I received my Juris Doctor from the Georgetown University Law Center. After  
15 earning my Juris Doctor degree, I spent two years on a research and teaching fellowship at the  
16 University of Florida.

17 7. Since receiving my degree, I have taught classes at the University of Florida and at  
18 Barry University School of Law.

19 8. I am admitted to practice in Massachusetts, Florida, California, and Arizona, with  
20 an application in Nevada currently pending. I am admitted to practice before a dozen United  
21 States District Courts (Northern California, Central California, Eastern California, Southern  
22 California, Colorado, Northern Florida, Middle Florida, Southern Florida, Massachusetts, Arizona,  
23 Eastern Michigan, and Northern Texas), four Courts in the Circuit of Appeals (1<sup>st</sup>, 7<sup>th</sup>, 9<sup>th</sup> and 11<sup>th</sup>)  
24 and the United States Supreme Court.

1           9.       I have been a practicing attorney since 2002, and served as a partner at my previous  
2 firm (Weston, Garrou, Walters & Mooney) before taking my current position as managing partner  
3 of the Randazza Legal Group.

4           10.       I am a member of the First Amendment Lawyers Association and have been  
5 engaged by the organization on numerous occasions for speaking engagements. During these  
6 speaking engagements, I provide updates on intellectual property law to a national organization of  
7 First Amendment Lawyers.  
8

9           11.       Seven articles I have authored have been published in law review and bar journal  
10 publications. I have also made numerous television and radio guest appearances and been quoted  
11 many times in articles dealing with my particular area of legal expertise. I am frequently sought  
12 out as a source of information for journalists, nationwide, when they are seeking commentary on  
13 intellectual property matters.  
14

15           12.       I am frequently retained in copyright litigation and media law cases nationwide,  
16 and have developed a national reputation in this area of law.  
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18           13.       Given my credentials, experience, and reputation, I have established an hourly rate  
19 at \$500 per hour. However, when this case commenced, my rate was \$450 per hour.

20           14.       I have spent 20.5 hours working with the items relating to the Motion for Spoliation  
21 and Terminating sanctions. Please see the attached chart outlining these hours. Accordingly, my  
22 fees for this time would come to \$9,225.  
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1 Pursuant to the laws of the United States, I declare under penalty of perjury the foregoing  
2 is true and correct.

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4 Dated: September 29, 2011 in Las Vegas, Nevada

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7 s/Marc J. Randazza

8 MARC J. RANDAZZA  
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**HOURS RE MOTION FOR SANCTIONS/SPOILIATION**

DATE	HOURS	DESCRIPTION OF WORK
6/25/2011	3.40	Review of case law involving sanctions and other research into sanctions; Calls and emails with co-counsel and opposing counsel regarding potential for sanctions.
6/26/2011	3.30	Reviewing legal arguments put forth by opposing legal counsel and strategizing with co-counsel to determine proper courses regarding sanctions; Examining law and evidence with respect to sanctions.
6/26/2011	3.10	Receipt and review of motion for sanction draft; Drafting new sections for the motion and continuing research for said new sections.
7/5/2011	1.40	Telephone calls with co-counsel to discuss research, remedies and strategies relating to the motion for sanctions; Reviewing and editing content provided by co-counsel for motion.
7/6/2011	1.40	Final drafting of motion for sanctions; Calls with co-counsel to finalize details in motion.
7/7/2011	0.50	Review of documents filed with the court; Research concerning the termination of sanctions and lesser potentials for sanctions in preparation for reply briefing.
7/27/2011	3.40	Collaborating with co-counsel on finalizing reply briefing regarding sanctions; Research regarding judicial notice and U.K. legal standards.
8/2/2011	4.00	Drafting and editing reply briefing; exchanging drafts with co-counsel and discussing drafts and strategy.